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By ECF

Honorable Brian M. Cogan
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: United States v. Linda Sun, a/k/a “Wen Sun,” “Ling Da Sun,” and “Linda Hu,”
and Chris Hu, 24 Cr. 346 (BMC) (TAM)**

Your Honor:

We represent Linda Hu in the above-referenced case and, with the consent of the Government, write respectfully to request clarification of a condition of her release.

Following the arraignment held on September 3, 2024, before the Honorable Peggy Kuo, Mrs. Hu was released on conditions that included, among other things, a requirement that she have no contact with the consulate or mission of the People’s Republic of China (“PRC”). (*See* Doc. No. 13 at 1.) While imposing that condition, Magistrate Judge Kuo described its scope in a manner that may unduly restrict Mrs. Hu’s other community interactions. In order to facilitate her compliance and avoid any miscommunications, counsel respectfully requests that the Court clarify this condition to provide as follows:

The condition of release regarding contact between Linda Hu and the PRC Consulate or Mission prohibits any travel to the consulate or mission, any attempts to contact (whether orally or in writing) representatives of the consulate or mission, and any discussions with representatives of the consulate or mission regarding this case and related subject matters outside the presence of counsel. For the avoidance of doubt, however, this condition shall not prohibit unplanned or uncoordinated conversations with individuals affiliated with the consulate or mission in public settings regarding matters unrelated to this case.

We have conferred with the Government regarding the above clarification, and have been informed that it has no objection to this request.

Respectfully submitted,

By: /s/ Jarrod L. Schaeffer

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